

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Richard L. Roberts, Sr.,	)	Case No. 3:05CV7365
Plaintiff,	)	Judge Katz
v.	)	<b><u>CONSENT TO REMOVAL OF</u></b>
Glens Falls Insurance Company, <u>et al.</u> ,	)	<b><u>DEFENDANT GLENS FALLS</u></b>
Defendants.	)	<b><u>INSURANCE COMPANY</u></b>
	)	
	)	
	)	
	)	
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Defendant, Glens Falls Insurance Company, by and through its attorneys, hereby consents to removal of this action to the United States District Court for the Northern District of Ohio, Western Division and states that it previously provided such consent orally to counsel for Defendant American Guaranty Liability Insurance Company based upon total diversity of jurisdiction in this case.

**WHEREFORE**, Defendant Glens Falls Insurance Company consents to removal of this action to the United States District Court of the Northern District of Ohio, Western Division.

Respectfully submitted,

**SPENGLER NATHANSON P.L.L.**

\_\_\_\_\_/s/ Byron S. Choka\_\_\_\_\_  
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Attorneys for Defendant

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been sent by ordinary United States mail, postage prepaid, this 15th day of September to Ralph DeNune, III, Esq. and Steven B. Mosier, Esq., McHugh, DeNune & McCarthy, Ltd., 5580 Monroe Street, Sylvania, Ohio, 43560-2538, Attorneys for Plaintiff; and to Steven G. Janik, Esq., Janik & Dorman, L.L.P., 9200 South Hills Boulevard, Suite 300, Cleveland, Ohio, 44147-3521, Attorneys for Defendant American Guaranty Liability Insurance Company.

\_\_\_\_\_/s/ Byron S. Choka\_\_\_\_\_  
Byron S. Choka (0014249)